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April 23, 1986

Mr. Philip F. Gramlich, Manager Longshot Mine 460 Rosetree Lane Moab, Utah 84532

Dear Mr. Gramlich:

Re: MR-1 Review, Longshot Mine, PRO/019/018, Grand County, Utah

Thank you for your Notice of Intention to Commence Mining Operations and Mining and Reclamation Plan for the proposed Longshot Mine. Pursuant to 40-8-13(3) the Division cannot approve the MR-1 application as submitted. The attached deficiencies must be adequately addressed before the plan can be approved.

To facilitate your response to the attached deficiencies, Division staff would like to visit the site the week of May 5-9, 1986. Any questions you might have could be answered at that time. Would you please advise me of a suitable time so that you or a representative can accompany Division staff to the site.

Thank you for your cooperation in this matter.

Sincerely,

L. P. Braxton Administrator

Mineral Resource Development

John Jh hickens for

and Reclamation Program

JJW:jvb

cc: J. Fricke

R. Harden

J. Leatherwood

K. Mutz

R. Smith

J. Whitehead

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Mining and Reclamation Plan Permit Application Longshot Mine PRO/019/018 Grand County, Utah

April 22, 1986

Rule M-3 - JRH

The operator has adequately provided maps and a drawing of the site in order to determine this section complete. It appears on the map however, that some of the area to be disturbed is not within the lease area as can be seen on Map 2 and Map 4 of the MRP. The Operator needs to incorporate this area into the permit area and lease area or modify the mining plan to exclude this area.

The operator should obtain a copy of the plat map of the area from the county recorder and include a copy of the map in the mine plan. Lease numbers and permits involved with the mine site and the adjacent areas should also be included in the mine plan.

Rule M=3(1)(d) - JF

The applicant shall show the name of the stream that runs through the property on a "true" or correct map. Please insert the name of the stream on the USGS 7 1/2 minute quad maps in the mine plan.

Rule M-3(1)(e) - JF

The applicant's project area drawing does not accurately reflect the drainage direction of the mine. A topographic map, in a scale of 1:500, showing the mine workings would meet the requirement of this regulations.

Rule M=3(1)(f) - RVS

The applicant must show the location of test pits on a map that also indicates areas of proposed mining. Applicant must indicate the depth of each test site and whether water was encountered.

Rule M-3 (2)(a)&(b) Land Use - KMM

In addition to mining, grazing is listed as a prior, current and potential future use of the site. Please provide an estimate of productivity of the area (e.g. AUM's permitted, lbs/acre of forage, range site condition). The Soil Conservation Service or Forest Service may be able to provide this information. Are there any range improvements near the site that may be damaged or disrupted by the mining operation?

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Recreation should be considered as a current and future use of the area. Mining plans should take this use into consideration.

Rule M-5 - JRH

The Operator has provided a cost estimate for reclamation of the site. Final determination of the bond amount required by the Division will be made upon determination of adequacy of the submitted reclamation plan for the site. The Operator should include copies of any reclamation contracts or bonds with the Forest Service with the plan. Such an amount required by the Forest Service will be incorporated into any amount determined by the Division.

Rule M=10(3) - JF

The applicant states that the ponds and mining area will be reclaimed to Forest Service approval, but does not explain what the Forest Service standards entail. The sediment ponds must be reclaimed so that they are non-impounding and self draining.

Rule M=10(8) - JF

The applicant will be constructing two ponds in a dry gravel wash and a diversion in the North Fork of Mill Creek. The mine plan must contain accurate and detailed hydrologic plans for the ponds and the diversion. The hydrologic plans must include but shall not be limited to, drainage area above the ponds, pond cross-sections, pond capacity and a plan for diverting natural runoff from entering the ponds. The applicant must demonstrate that the ponds will not impact the North Fork of Mill Creek during storm run-off. The diversion for the process water must also be designed in a sound hydrologic manner. The diversion design should include cross-sections, material that will be used, capacity calculations, and should demonstrate that the structure will accommodate storm runoff.

Rule M=10(2)(c) - RVS

The applicant must identify and commit to reclaiming all test pits that will not be consumed by mining.

Rule M-10(12) Revegetation Success Standards - KMM (2) & (3) Success Standards and Practical Treatments

Success of revegetation and, therefore, bond release is judged on a comparison between the vegetative cover of the revegetated areas and the similar vegetation types surrounding the mine. This requires a good estimate of vegetative cover "determined by the operator using professionally accepted inventory methods and approved by the Division".

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The applicant's description of the vegetation cover as "10% cedar and Pinyon and 1% Oak" is not compatible with the statement that the site is "too shady for anything else" to grow. A better estimate of cover is needed.

Two rare plants are known from the vicinity: <u>Cycladenia humilis</u> var. <u>jonesii</u> and <u>Lomatium latiloba</u>. Has the Forest Service surveyed the area for these plants and provided a clearance?

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